

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- X

CERTAIN UNDERWRITERS AT LLOYD’S,
LONDON, INDIAN HARBOR INSURANCE
COMPANY, QBE SPECIALTY INSURANCE
COMPANY, STEADFAST INSURANCE
COMPANY, GENERAL SECURITY INDEMNITY
COMPANY OF ARIZONA, UNITED SPECIALTY
INSURANCE COMPANY, LEXINGTON
INSURANCE COMPANY, SAFETY SPECIALTY
INSURANCE COMPANY, HDI GLOBAL
SPECIALTY SE, and OLD REPUBLIC UNION
INSURANCE COMPANY,

Civil Action No. _____

**Notice of Petition to
Compel Arbitration**

Petitioners,

vs.

ERIC & DENISE FRANCE PROPERTIES, LLC,

Respondent.

----- X

PLEASE TAKE NOTICE, that upon the annexed: (1) Petition to Compel Arbitration; (2) Memorandum of Law in Support of the Petition; and (3) October 24, 2022 Declaration of Jeffrey S. Weinstein with exhibits, Petitioners Certain Underwriters at Lloyd’s, London, Indian Harbor Insurance Company, QBE Specialty Insurance Company, Steadfast Insurance Company, General Security Indemnity Company of Arizona, United Specialty Insurance Company, Lexington Insurance Company, Safety Specialty Insurance Company, HDI Global Specialty SE, and Old Republic Union Insurance Company, by and through their attorneys, Mound Cotton Wollan & Greengrass, LLP, will apply, at the United States Courthouse located at 500 Pearl Street, New York, New York, 10007, on a date and time convenient for the Court, for an Order pursuant to 9 U.S.C. §§ 3 and 4, and 9 U.S.C. § 206, for an order compelling Respondent’s

participation in the arbitration process demanded under the binding Arbitration Agreements to which the Insurers and Respondent are parties and to stay all litigation pending arbitration.

Dated: New York, New York
October 24, 2022

By: /s/ Jeffrey S. Weinstein
Jeffrey S. Weinstein
David A. Nelson
Samuel B. Weiss
Mound Cotton Wollan & Greengrass
LLP
One New York Plaza Fl. 44
New York, New York 10004
JWeinstein@moundcotton.com
DNelson@moundcotton.com
SWeiss@moundcotton.com
Tel: (212) 804-4200
Fax: (212) 344-8066

Attorneys for Petitioners